



May 21, 2021

VIA ELECTRONIC FILING

The Honorable Stephanos Bibas
18614 U.S. Courthouse
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Warren K. Mabey, Jr.
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Re: *TexasLDPC Inc. v. Broadcom Inc. et al.*, C.A. No. 1:18-cv-01966-SB

Dear Judge Bibas:

Pursuant to the Court's May 4, 2021, Scheduling Order, D.I. 78, paragraph 17, the parties provide the following status update on the California action:

The parties are in the midst of conducting Court-ordered discovery of Defendants and certain third parties before resolving the California Defendants' special motion to strike pursuant to the California anti-SLAPP statute. The California Defendants and third parties TexasLDPC, Weihuang (a/k/a Frank) Wang, and Osso Vahabzadeh produced documents on April 30, 2021. Third party Frank Wang was deposed on May 13, 2021.

Between April 20, 2021 and April 26, 2021, the California Defendants and third-party Dr. Osso Vahabzadeh made available to California Plaintiff LSI's third-party electronic discovery vendor various electronic devices and cloud accounts for imaging. The Parties are still in the process of processing and conducting a privilege review of the large volume of data that was extracted from the electronic devices and cloud accounts that were made available for imaging.

The Parties have agreed to delay the taking of the California Defendants' and Dr. Vahabzadeh's depositions until the information from the foregoing devices and cloud accounts is processed and reviewed. The Parties have agreed to continue the proceedings to allow the parties sufficient time for the foregoing discovery to conclude.

Today, on May 21, the parties will be filing a joint stipulation to move the deadline to conduct the deposition of third party Osso Vahabzadeh to July 30, 2021 and to continue the hearing date set for the California Defendants' Anti-SLAPP Motion and Demurrer to October 7, 2021, or such later date as the Court may set.

Sincerely,

A handwritten signature in dark ink, appearing to read "Warren K. Mabey Jr.", written in a cursive style.

Warren K. Mabey Jr.
On behalf of the parties
cc: All Counsel of Record – via e-mail